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13 Attorneys for Plaintiff, the Collective,
14 and putative Class, and Aggrieved Employees on
behalf of the State of California

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

18 PAUL MONPLAISIR, on behalf of himself
and all others similarly situated.

Plaintiffs,

Defendants.

Case No. 3:19-cv-01484-WHA

NOTICE OF FILING OF CONSENTS TO JOIN COLLECTIVE ACTION

Judge: Hon. William Alsup

Complaint Filed: March 21, 2019
Trial Date: October 19, 2020

1 **NOTICE OF FILING CONSENTS TO JOIN COLLECTIVE ACTION**

2 Plaintiff Paul Monplaisir, individually and on behalf of all persons similarly situated,
 3 hereby files the following Opt-In Consent Forms, submitted herewith as Exhibits 1 through 3,
 4 pursuant to the Fair Labor Standards Act, 29 U.S.C. §§ 201, *et seq.*

5

6 **CONSENTS TO JOIN COLLECTIVE ACTION**

7 EXHIBIT NUMBER	8 NAME	9 OPT-IN NUMBER
10 1	James Mills	153 ¹
11 2	Giovanni Lara	158
12 3	Daniel Tormo	159

13 Date: November 4, 2019

14 Respectfully submitted,

15 _____
 16 /s/ *Michelle S. Lim*
 Carolyn H. Cottrell
 Ori Edelstein
 Michelle S. Lim
 SCHNEIDER WALLACE
 COTTRELL KONECKY
 WOTKYNS LLP

17

18 Sarah R. Schalman-Bergen (admitted *pro hac vice*)
 Krysten L. Connor (admitted *pro hac vice*)
 BERGER & MONTAGUE, P.C.

19

20 Attorneys for Plaintiff, the Collective,
 21 and putative Class, and Aggrieved Employees on behalf
 22 of the State of California

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26 ¹ Due to inadvertent clerical error, Plaintiff skipped opt-in number 153 in a prior notice filed on
 27 November 1, 2019. For purposes of consistency, Plaintiff has assigned opt-in number 153 in the
 instant filing. ECF 94.

CERTIFICATE OF SERVICE

I hereby certify that on November 4, 2019, I electronically filed the foregoing document with the Clerk of the Court using the Court's CM/ECF system, which will send a notice of electronic filing to all CM/ECF participants.

Date: November 4, 2019

Respectfully submitted,

/s/ Michelle S. Lim
Carolyn H. Cottrell
Ori Edelstein
Michelle S. Lim
SCHNEIDER WALLACE
COTTRELL KONECKY
WOTKYNS LLP

Sarah R. Schalman-Bergen (admitted *pro hac vice*)
Krysten L. Connor (admitted *pro hac vice*)
BERGER & MONTAGUE, P.C.

Attorneys for Plaintiff, the Collective,
and putative Class, and Aggrieved Employees on behalf
of the State of California

EXHIBIT 1

OPT-IN CONSENT FORM

Complete And Submit To:

Carolyn Hunt Cottrell, Esq.
SCHNEIDER WALLACE
COTTRELL KONECKY
WOTKYNS LLP
2000 Powell Street, Suite 1400
Emeryville, California 94608

OR

Sarah R. Schalman-Bergen
BERGER & MONTAGUE, P.C.
1818 Market Street, 36th Floor
Philadelphia, Pennsylvania 19103

Name: James Mills (Please Print)	Date of Birth: [REDACTED]
Address: [REDACTED]	Phone No. 1: [REDACTED] Phone No. 2: [REDACTED] E-mail Address: [REDACTED]

CONSENT TO JOIN COLLECTIVE ACTION

Pursuant to the Fair Labor Standards Act, 29 U.S.C. §§ 201, et seq.

1. I consent and agree to pursue my claims relating to and arising from Defendant Integrated Tech Group (ITG) alleged violations of the Fair Labor Standards Act, 29 U.S.C. §§ 201, *et seq.* in connection with the above-referenced litigation.
 2. I have worked for ITG as a Technician from approximately (month, year) 03/16 to approximately (month, year) 06/19.
I worked in **(list the cities and states of branches worked and include cities and states worked as a Traveling Technician)** Jax fla 03/16-03/18 Sacramento ca 03/18-05/18 SF CA. 05/18-06/19(BAY AREA).
 3. I understand that this litigation has been filed as a proposed collective action under the Fair Labor Standards Act of 1938, as amended, 29 U.S.C. §§ 201, *et seq.* I hereby consent, agree, and opt-in to become a Plaintiff herein and be bound by any judgment of the Court or any settlement of this action.
 4. I specifically authorize my attorneys, Schneider Wallace Cottrell Konecky Wotkyns and Berger & Montague to prosecute this lawsuit on my behalf and to negotiate a settlement of any and all claims I have against the Defendant in this litigation.

11/1/2019 _____ (Date Signed)  DocuSigned by:
J. Wells
9D090D379C7A4B1... _____ (Signature)

****IMPORTANT NOTE****

Statute of Limitations concerns mandate that you return this form as soon as possible to preserve your rights.

EXHIBIT 2

OPT-IN CONSENT FORM

Monplaisir, et al. v. Integrated Tech Group, LLC and ITG Communications LLC

Case No. 3:19-cv-01484-WHA

United States District Court, Northern District of California

Complete And Submit To:

ITG FLSA Litigation
c/o JND Legal Administration
PO Box 91300
Seattle, WA 98111

Name: Giovanni Lura (Please Print)

CONSENT TO JOIN COLLECTIVE ACTION

Pursuant to the Fair Labor Standards Act, 29 U.S.C. §§ 201, *et seq.*

1. I consent and agree to pursue my claims relating to and arising from Defendants Integrated Tech Group, LLC's and ITG Communications LLC's ("ITG") alleged violations of the Fair Labor Standards Act, 29 U.S.C. §§ 201, *et seq.* in connection with the above-referenced litigation.
2. I have worked for ITG as a Technician or similarly titled position in (city, state) Miami FL, N from on or about (start date) Nov. 20, 2016 to on or about (end date) June 18, 2017
3. I understand that this litigation is being filed as a collective action under the Fair Labor Standards Act of 1938, as amended, 29 U.S.C. §§ 201, *et seq.* I hereby consent, agree, and opt-in to become a named Plaintiff herein and be bound by any judgment of the Court or any settlement of this action.
4. I specifically authorize my attorneys, Schneider Wallace Cottrell Konecky LLP, and Berger Montague as my agents, to prosecute this lawsuit on my behalf and to negotiate a settlement of any and all claims I have against the Defendant in this litigation.

10/28/2019

(Date Signed)



(Signature)

****IMPORTANT NOTE****

Statute of Limitations concerns mandate that you return this form as soon as possible to preserve your rights.

EXHIBIT 3

OPT-IN CONSENT FORM

Monplaisir, et al. v. Integrated Tech Group, LLC and ITG Communications LLC
Case No. 3:19-cv-01484-WHA
United States District Court, Northern District of California

Complete And Submit To:

ITG FLSA Litigation
c/o JND Legal Administration
PO Box 91300
Seattle, WA 98111

NOV 01 2019

Name: Daniel Tormo (Please Print)

CONSENT TO JOIN COLLECTIVE ACTION

Pursuant to the Fair Labor Standards Act, 29 U.S.C. §§ 201, *et seq.*

1. I consent and agree to pursue my claims relating to and arising from Defendants Integrated Tech Group, LLC's and ITG Communications LLC's ("ITG") alleged violations of the Fair Labor Standards Act, 29 U.S.C. §§ 201, *et seq.* in connection with the above-referenced litigation.
2. I have worked for ITG as a Technician or similarly titled position in (city, state) Miami
Florida from on or about (start date) 09-06-2016 to on or about (end date) 11-25-2018.
3. I understand that this litigation is being filed as a collective action under the Fair Labor Standards Act of 1938, as amended, 29 U.S.C. §§ 201, *et seq.* I hereby consent, agree, and opt-in to become a named Plaintiff herein and be bound by any judgment of the Court or any settlement of this action.
4. I specifically authorize my attorneys, Schneider Wallace Cottrell Konecky LLP, and Berger Montague as my agents, to prosecute this lawsuit on my behalf and to negotiate a settlement of any and all claims I have against the Defendant in this litigation.

10-28-2019 (Date Signed)



(Signature)

****IMPORTANT NOTE****

Statute of Limitations concerns mandate that you return this form as soon as possible to preserve your rights.